

# EXHIBIT 9

## **PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON ISSUES OF INFRINGEMENT AND DEFENDANTS' INVALIDITY DEFENSES**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

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SIGNIFY NORTH AMERICA	:	
CORPORATION and SIGNIFY HOLDING	:	
B.V.,	:	
	:	
Plaintiffs,	:	CIVIL ACTION FILE
	:	NUMBER:
versus	:	2:22-cv-2095
	:	
LEPRO INNOVATION INC., LE	:	
INNOVATION INC., INNOVATION	:	
RULES INC., HOME EVER INC., and	:	
LETIANLIGHTING, INC.,	:	
	:	
Defendants.	:	

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VIDEOTAPED DEPOSITION OF  
JOHN W. CURRAN, PH.D.  
VOLUME III

9:11 a.m.  
October 17, 2024

REGUS BUSINESS CENTER  
100 Bull Street  
Second Floor  
Savannah, Georgia

Job No.: 556582  
Pages: 488 - 628

Stenographically Reported By:  
Susan DiFilippantonio, RPR, RMR, California CSR 14383

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1 APPEARANCES:

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3 CORPORATION and SIGNIFY HOLDING B.V.:

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9 On Behalf of the Defendants, LEPRO INNOVATION INC., LE  
10 INNOVATION INC., INNOVATION RULES INC., HOME EVER INC.,  
and LETIANLIGHTING, INC.:

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15 Also Present: Matthew Simpson, videographer  
16 Eyal Filkovsky, technician  
Aaron Rugh, in-house counsel Signify  
(via videoconference)  
17 Gary Yen, in-house counsel Signify  
(via videoconference)  
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(Thursday, October 17, 2024 9:11 a.m.)

TECHNICIAN: Thank you to everyone for attending this proceeding remotely, which we anticipate will run smoothly. Please remember to speak slowly and do your best not to talk over one another. Please be aware that we are recording this proceeding for backup purposes. Any off-the-record discussions should be had away from the computer. Please remember to mute your mic for those conversations. Please have your video enabled to help the reporter identify who is speaking. If you are unable to connect with video and are connecting via phone, please identify yourself each time before speaking. I apologize in advance for any technical-related interruptions. Thank you.

THE VIDEOGRAPHER: Okay. Stand by for video.

Here begins Media Number 1 in the continued videotaped deposition of John W. Curran, Ph.D. in the matter of Signify North America Corporation, et al., v. Lepro Innovations Inc., et al., in the United States District Court for the District of Nevada, Case Number 2:22-CV-02095.

Today's date is October 17, 2024. The

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1 time on the video monitor is 9:11 a.m. The  
2 videographer today is Matthew Simpson, representing  
3 Planet Depos. This video deposition is taking  
4 produce at 100 Bull Street, Suite 200, Savannah,  
5 Georgia 31401.

09:12:08

09:12:12

09:12:16

09:12:18

09:12:21

6 Would counsel please voice-identify  
7 themselves and state whom they represent.

09:12:23

09:12:26

8 MR. OCZEK: Good morning. Jeremy Occek  
9 for plaintiffs Signify from the law firm Bond,  
10 Schoeneck & King, here with my partner Jonathan  
11 Gray.

09:12:28

09:12:31

09:12:35

09:12:38

12 MR. CHEN: Good morning. This is Hua  
13 Chen from the law firm of ScienBiziP, PC, hereby  
14 representing the Lepro defendants in this case.

09:12:38

09:12:42

09:12:45

15 THE VIDEOGRAPHER: The Court Reporter  
16 today is Susan DiFilippantonio, representing Planet  
17 Depos. The witness will now be sworn.

09:12:48

09:12:49

09:12:52

18 JOHN W. CURRAN, PH.D.,  
19 called as a witness at the instance of the Plaintiffs,  
20 being first duly sworn, was examined and deposed as  
21 follows:

22 THE WITNESS: I do.

23 THE REPORTER: Thank you.

24 EXAMINATION

25 BY MR. OCZEK:

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1	question, sir.	09:15:49
2	A. Okay.	09:15:50
3	Q. My understanding is none of your opinions on	09:15:51
4	validity are on the basis of written description,	09:15:55
5	enablement or indefiniteness. Is that your	09:15:58
6	understanding, sir?	09:16:06
7	A. I believe so, yes.	09:16:06
8	Q. Okay. So, in other words, there's -- you don't	09:16:07
9	have any opinions in your report on written description,	09:16:09
10	enablement or indefiniteness, correct?	09:16:12
11	A. Can I -- I promise I won't look long. Just can	09:16:26
12	I look at written description and -- and enablement	09:16:28
13	because --	09:16:32
14	Q. Yeah. I mean, the other thing is you can look	09:16:32
15	at like the table of contents and it -- it's -- that	09:16:34
16	gives you the -- the roadmap. I've looked at it. I	09:16:37
17	haven't seen anything. This is just a matter of	09:16:41
18	housekeeping. I just want to confirm.	09:16:42
19	A. Okay. Yes, I believe that's true, unless I'm	09:16:45
20	forgetting something in here, but I don't think I am.	09:18:03
21	Q. Okay.	09:18:05
22	MR. OCZEK: And maybe, Mr. Chen, is that	09:18:08
23	your understanding, as well?	09:18:09
24	MR. CHEN: That is my understanding. I	09:18:10
25	don't think we intend to have Dr. Curran to testify	09:18:15

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1	or provide opinion on these issues, which is	09:18:19
2	indefiniteness, lack of indem- -- enablement -- and	09:18:23
3	what was the other one, Counsel?	09:18:27
4	MR. OCZEK: Written description.	09:18:30
5	MR. CHEN: Written description. If that	09:18:31
6	changes, we can always follow up, but I don't think	09:18:34
7	that is going to be the case.	09:18:36
8	MR. OCZEK: Okay. So, in other words,	09:18:38
9	there's no 112 issues in terms -- in terms of his	09:18:39
10	report?	09:18:42
11	MR. CHEN: That is correct.	09:18:43
12	MR. OCZEK: Okay. Thank you for that	09:18:44
13	confirmation.	09:18:45
14	BY MR. OCZEK:	09:18:46
15	Q. All right. Sir, do you recall yesterday when we	09:18:47
16	were discussing the start-up voltage of a fluorescent	09:18:50
17	ballast?	09:18:54
18	A. Yes.	09:18:55
19	Q. All right. And I think you said given the	09:18:56
20	figure of 600 volts as the start-up voltage for a	09:18:59
21	fluorescent ballast; is that correct?	09:19:03
22	A. Yes.	09:19:04
23	Q. Is the start-up voltage also called the ignition	09:19:05
24	voltage?	09:19:11
25	A. That sounds familiar.	09:19:13